

STATE OF MAINE  
OFFICE OF SECURITIES  
121 STATE HOUSE STATION  
AUGUSTA, ME 04333

IN RE:

Aggressive Advertising Associates,  
LLC and Raymon Oxuzidis

CONSENT ORDER  
11-7799

This is an order of the Securities Administrator issued under 32 M.R.S. § 16604 of the Maine Uniform Securities Act (the "Act") with the consent of Aggressive Advertising Associates, LLC ("AAA") and Raymon Oxuzidis ("Oxuzidis"), managing member of AAA. AAA and Oxuzidis ("Respondents") neither admit nor deny the Findings of Fact and Conclusions of Law set forth below, but agree to the entry of this Consent Order, agree that it shall have the same effect as an order issued after hearing, and waive their right to a hearing and to judicial review. Respondents further agree that they shall be precluded from disputing the Findings of Fact and Conclusions of Law as set forth herein in any other adjudicatory proceeding in the State of Maine.

**I. FINDINGS OF FACT**

1. AAA is a limited liability company organized pursuant to the laws of the State of Arizona with a principal place of business of 303 N. Central Avenue, Suite 103-275, Phoenix, AZ 85012.
2. Oxuzidis is an individual who has been at all relevant times the managing member of AAA. Oxuzidis is a resident of Surprise, AZ.
3. On or about January 10, 2010, a Maine resident received a telephone solicitation from an individual who said he worked for AAA. The individual told the Maine resident the following:
  - a. If the Maine resident purchased advertisements from AAA, and the advertisement resulted in a sale of services to a consumer, he would receive a portion of the fee paid by the consumer purchasing services;
  - b. The individual's father and daughter had invested in AAA and their investments had been very successful; and

- c. The Maine resident could as much as double his money by investing in AAA, but at a minimum he would receive at least a 9% return on his investment.
4. As a result of the solicitation made by the individual, on or about January 19, 2010, the Maine resident agreed to and did invest \$570 in AAA.
5. Subsequent to his initial investment in AAA, the Maine resident received telephone solicitations from a second individual who said he worked for AAA urging him to invest additional monies in AAA.
6. As a result of the solicitation made by this second individual, on or about January 23, 2010, the Maine resident invested an additional \$9,925 in AAA for a total investment of \$10,495.
7. When the Maine resident did not receive the promised returns from AAA, he attempted to contact AAA using the telephone numbers that had been provided to him by the two individuals, but the telephone numbers he called were no longer in service.
8. On or about October 29, 2011, the Maine resident contacted the Office of Securities regarding his AAA investment. As a result, the Staff of the Office of Securities (the "Staff") sent a letter to Respondents advising them that AAA was offering and selling securities in Maine in violation of the Act. The Staff asked Respondents to provide information regarding all sales of securities by AAA in Maine.
9. In response to the Staff's letter, Oxuzidis provided an affidavit agreeing to cease AAA's solicitations in Maine. He also provided, through his attorney, a list of Maine residents who had invested in AAA. The list indicated that ten Maine residents had invested a total of \$24,085.67 in AAA.
10. At the time of the investments made by the Maine residents, the securities offered by AAA were not registered, exempt from registration, or federal covered securities.
11. At the time of the investments made by the Maine residents, AAA was not licensed or exempt from licensing as a broker-dealer nor were the individuals who said they worked for AAA agents of a broker-dealer or issuer in Maine.



## **II. CONCLUSIONS OF LAW**

1. It is unlawful to offer or sell any security in Maine unless the security is registered, exempt from registration, or a federal covered security. 32 M.R.S. § 16301.
2. The investment described by AAA's agents and sold to the Maine residents are securities. 32 M.R.S. § 16102(28).
3. It is unlawful to transact business in Maine as a broker-dealer or an agent of a broker-dealer or issuer unless licensed or exempt from licensing. 32 M.R.S. §§ 16401, 16402.
4. By engaging in the conduct described above, Respondents sold unregistered securities and sold securities without a license in violation of 32 M.R.S. §§ 16301, 16401, 16402.
5. Every person who directly or indirectly controls another person liable for a violation of the Act is liable to the same extent as that other person, unless the control person did not know, and in the exercise of reasonable care could not have known, of the existence of the conduct that is a violation. 32 M.R.S. § 16612.
6. Oxuzidis, as managing member of AAA, had direct control over AAA and AAA employees Oxuzidis consequently is liable for the violations committed by AAA and its employees.
7. This Consent Order is in the public interest because it will protect Maine investors by deterring future misconduct by AAA, Oxuzidis, and others and will foster public confidence in the securities industry.

## **III. ORDER**

1. AAA and Oxuzidis shall not act as a broker-dealer or agent in Maine unless properly licensed by the Office of Securities to do so.
2. AAA and Oxuzidis shall not offer Maine investors securities that are not registered, exempt from registration or federal covered securities.
3. AAA and Oxuzidis shall comply with all other legal requirements governing persons buying or selling securities in the State of Maine at all times from the date hereof.
4. In lieu of a civil penalty, Respondents shall pay \$24,085.67 in restitution to the Maine residents by installment, with the first payment of \$1,000 to be paid via check made payable to "Treasurer, State of Maine" and due at the time Respondents return the Consent Order containing their signatures to the Office of Securities. The remainder of the payments are to be made in 22 monthly installments of \$1,000 and one final payment of \$1,085.67. Each payment subsequent to the first will be due by the first day of each

subsequent month, and all payments are to be made via check made payable to "Treasurer, State of Maine" and delivered on or before the due date at the Office of Securities, which shall distribute the funds to the Maine residents.

5. If Respondents fail to make restitution payments as set forth above, all remaining restitution payments become immediately due and payable.
6. Except as set forth above, the Securities Administrator agrees to take no action adverse to AAA or Oxuzidis based solely on the same conduct addressed in this Consent Order. However, nothing in this Consent Order shall preclude the Securities Administrator from:  
(a) taking adverse action based at least in part on other conduct; (b) taking this Consent Order and the conduct described above into account in determining the proper resolution of action based on other conduct; or (c) taking any and all available steps to enforce this Consent Order.

Respondents, by signing below, neither admit nor deny the Findings of Fact and Conclusions of Law set forth above, agree to the entry of this Consent Order, agree that it shall have the same effect as an order issued after hearing, waive any right to a hearing and to judicial review, and agrees that they shall be precluded from disputing the Findings of Fact and Conclusions of Law as set forth herein in any adjudicatory proceeding in the State of Maine.

Date: June 6, 2012

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Aggressive Advertising Associates, LLC  
By: Raymon Oxuzidis, Managing Member

Date: June 6, 2012

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Raymon Oxuzidis

Date: June 18, 2012

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Judith M. Shaw  
Securities Administrator